

COUNTY OF LOS ANGELES DEPARTMENT OF AUDITOR-CONTROLLER

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June 10, 2004

TO: Supervisor Don Knabe, Chairman

Supervisor Gloria Molina Supervisor Yvonne B. Burke Supervisor Zev Yaroslavsky

Supervisor Michael D. Antonovich

FROM: J. Tyler McCauley

Auditor-Controller

SUBJECT: **JEWISH VOCATIONAL SERVICES CONTRACT REVIEW**

We have completed a contract compliance review of Jewish Vocational Services (JVS), a Refugee Immigrant Training and Employment Program (RITE) service provider. The review was conducted as part of the Auditor-Controller's Centralized Contract Monitoring Pilot Project.

Background

The Department of Community and Senior Services (DCSS) contracts with JVS, a private, non-profit, community-based organization, to provide job training services to Russian, Armenian, and Farsi speaking CalWORKS recipients who have resided in the United States over five years. The types of services provided by JVS include job readiness training, career planning services and job placement. JVS' offices are located in the Third District.

DCSS pays JVS a fixed fee for each type of service based on budgeted program costs and anticipated service levels. For Fiscal Year 2002-03, DCSS paid JVS approximately \$453,000.

Purpose/Methodology

The purpose of the review was to determine whether JVS was providing the services outlined in their County contract and maintaining proposed staffing levels. Our monitoring visit included a review of JVS' billing statements, participant case files, personnel and payroll records, and interviews with JVS staff, program participants and participant employers.

Results of Review

The program participants and employers interviewed confirmed the accuracy of the 13 employment outcomes sampled. However, JVS did not always ensure that program participants were appropriately paid with paychecks meeting the State Labor Code requirements. In addition, JVS overstated nine (56%) of the 16 job training outcomes (Case Management, Vocational Assessment, etc.), which resulted in JVS overbilling DCSS \$770 out of \$5,860 sampled. Examples of overbillings include the following:

- Billing for participants that did not require Vocational Assessments.
- Billing a Case Management fee when there was no face-to-face and/or telephone contact with the participant, as the contract requires.

JVS also billed for services provided to one individual that the GAIN Employment Activity and Reporting System (GEARS) reported as ineligible to receive program services. The services provided to this individual totaled approximately \$1,400.

JVS's five Case Managers currently possess the work experience required by DCSS' contract. However, one of the five Case Managers did not possess the required work experience and/or educational requirements at the time she was hired by JVS approximately five years ago. As a result, during the period of July 1999 – December 2000, JVS billed DCSS for services provided by this individual who did not have sufficient GAIN work experience.

Review of Report

On March 17, 2004, we discussed our report with JVS. In their attached response, JVS disagrees with our findings and provides documentation to support their billings to DCSS. However, the documentation provided by JVS was the same documentation submitted by JVS at our meeting on March 17, 2004, and in subsequent meetings and discussions. In each instance, we informed JVS the reasons why their documentation did not support the billings.

We also notified DCSS of the results of our review. DCSS will work with JVS and monitor them to ensure that areas of non-compliance disclosed in this report are resolved and will report to your Board within 60 days of this report.

We thank JVS for their cooperation and assistance during this review. Please call me if you have any questions, or your staff may contact Don Chadwick at (626) 293-1122.

JTM:DR:DC

Attachment

Board of Supervisors

June 10, 2004 Page 3

David E. Janssen, Chief Administrative Officer

Department of Community and Senior Services

Cynthia Banks, Chief Deputy Director

Josie Marquez, Program Director

Claudia Finkel, Chief Operating Officer, Jewish Vocational Services

Violet Varona-Lukens, Executive Officer

Public Information Office

Audit Committee

CENTRALIZED CONTRACT MONITORING PILOT PROJECT REFUGEE IMMIGRANT TRAINING AND EMPLOYMENT PROGRAM FISCAL YEAR 2003-2004 JEWISH VOCATIONAL SERVICES

BILLED SERVICES

Objective

Determine whether Jewish Vocational Services (JVS) accurately reported the outcomes of the program participants and that the program participants were eligible to receive services. JVS is paid a fee for each specific outcome (gaining full-time and part-time employment, upgrading from part-time to full-time employment, earning an hourly wage to be self-sufficient, participating in job training instruction, etc.) that the program participants achieve during the billing period.

Verification

We selected a sample of 13 program participants for which JVS billed employment outcomes and 16 program participants for which JVS billed job training outcomes and reviewed their case files for documentation to support the billings that JVS reported in October and November 2003. The outcomes represent \$5,860 (12%) of the \$50,382 that JVS billed the County for October and November 2003.

In addition, we interviewed 27 of the 29 program participants and 11 of the 13 employers to confirm the outcomes that JVS reported were actually achieved. We also reviewed the eligibility status of the 29 program participants on the GAIN Employment Activity and Reporting System (GEARS).

Results

Employment Outcomes

The 13 program participants and 11 of the employers that we were able to interview confirmed the accuracy of the 13 employment outcomes sampled. However, as noted later in the report, JVS did not always ensure that the program participants were appropriately paid with paychecks meeting the State Labor Code requirements.

Job Training Outcomes

JVS overstated 9 (56%) of the 16 job training outcomes (Case Management, Vocational Assessment, etc.), which resulted in JVS overbilling DCSS \$770 out of \$5,860 sampled.

- We selected a sample of six program participants that JVS billed the Department of Community and Senior Services (DCSS) for completing vocational assessments and noted:
 - Three (50%) program participants did not require the assessments, as identified in the County contract. Prior to receiving their assessments, two of the three program participants were already employed and the third program participant was exempted from the RITE program for medical reasons. JVS was paid \$140 for each participant.
 - Four (67%) program participants stated that their assigned JVS case manager never explained the results of the assessments. GEARS reported that the four participants have not been assigned to any designated activities based on the results of the assessments. In addition, two (33%) participants stated that JVS staff instructed them to sign several documents without explaining the documents to the participants.
- We selected a sample of 10 program participants that JVS billed DCSS for case management services and noted:
 - Four (40%) program participants stated that they did not receive monthly telephone or face-to-face contact with their Case Managers during October and November 2003, as required by the contract. Two other program participants also stated that their Case Managers contact them periodically, but that they can not remember the frequency. The six (60%) participant case files did not contain documentation to indicate that their Case Managers contacted them during this period.
 - One (10%) program participant was not assigned to JVS until November 2003. However, JVS billed DCSS for case management services in October 2003.

Participant Pay

California State Labor Code Section 226(a) requires that employers furnish each employee at the time of each payment an itemized statement in writing showing: (1) gross wages earned; (2) total hours worked for hourly wage earners; (3) all deductions; (4) net wages earned; (5) pay period; (6) the name of the employee and their social security number. In addition, the County contract requires JVS to review participants' paycheck stubs to confirm the hours worked prior to billing DCSS for job placements.

 Four (31%) of the 13 program participants with reported employment outcomes did not receive an itemized statement with their paychecks that reported the number of hours worked and/or any deductions for payroll taxes. JVS billed DCSS for the placements without reviewing the participants' paycheck stubs to confirm their employment and hours worked. In addition, JVS staff did not inform the participants, that earn an hourly wage, that their employers are required to provide them an itemized statement with each paycheck that list the hours worked and payroll deductions.

GEARS Activity

One program participant has not fulfilled their required weekly hours of program participation since March 2001. JVS should have referred the case to the Department of Public Social Services (DPSS) for non-compliance proceedings at that time. However, JVS did not refer the case and continued to bill DCSS \$42 per month for case management services and issued transportation expense reimbursements to the participant. The transportation expense overpayments to this individual totaled approximately \$1,400.

JVS management should ensure that DCSS is only charged for eligible services provided to individuals that qualify for program services. JVS management should also inform the program participants that the State Labor Code requires an itemized statement listing their hours worked and payroll deductions with each paycheck. In addition, JVS management needs to review all program documents with the participants prior to the participants signing them. JVS management should ensure that services provided to program participants are documented and recorded on GEARS. Also, JVS management should ensure that program participants that are not complying with program requirements are referred to DPSS for compliance procedures, in accordance with the contract.

Recommendations

JVS management:

- 1. Only charge DCSS for eligible services.
- 2. Only charge DCSS for services provided to individuals that qualify for program services.
- 3. Inform the program participants, that earn an hourly wage, that they are required to obtain from their employer a statement with each paycheck that lists the hours worked and payroll deductions.
- 4. Review all program documents with the participants prior to the participants signing them.
- 5. Ensure that services provided to program participants are documented in the case files and recorded on GEARS.

6. Ensure that program participants that are not complying with program requirements are referred to DPSS for compliance procedures, in accordance with the contract.

STAFFING/CASELOAD LEVELS

Objective

Determine whether JVS's staffing level is sufficient and that the Case Managers' caseloads do not exceed 115 program participants, as required by the County contract.

Verification

We interviewed JVS's staff and reviewed JVS's timekeeping records to determine actual staffing levels, and computed the minimum staffing levels required based on the Contactor's caseload.

Results

We determined that the Contractor's number of Case Managers is sufficient and that their average caseload of 97 participants did not exceed the maximum allowed by the County contract.

Recommendations

There are no recommendations in this section.

STAFFING QUALIFICATIONS

Objective

Determine whether JVS's staff meets the qualifications required by the County contract.

Verification

We interviewed JVS's staff and reviewed their personnel files for documentation to confirm their qualifications. The contract requires that Case Managers either possess a four-year college degree, an AA degree and two years of caseload experience, an AA degree and two years of employment counseling experience, or two years of employment counseling experience in a GAIN environment. Achievement of Junior class standing in an accredited college may be substituted for an AA degree provided other training or experience requirements are met.

Results

JVS's five Case Managers currently possess the work experience required by DCSS' contract. The Case Managers average between four to five years experience providing case management services. However, one of the five Case Managers did not possess the required work experience/education at the time JVS hired her approximately five years ago. As a result, during the period of July 1999 – December 2000, the County paid JVS for RITE services provided by an individual who did not meet the contract's educational/work experience requirements. JVS management needs to ensure that staff possess the required work experience prior to being hired to perform GAIN case management services.

Recommendation

7. JVS management ensure that staff possess the required work experience prior to being hired to perform GAIN case management services.

SERVICE LEVELS

Objectives

Determine whether JVS's reported services for Fiscal Year (FY) 2003-04 significantly varied from planned services levels.

Verification

Review DCSS' Annual Service Level Assessment report for FY 2003-04 and JVS's proposed services levels for the same period.

Results

We attempted to review JVS's ability to achieve planned service levels. However, DCSS was unable to provide the projected service levels used to allocate funding to JVS.

Recommendations

There are no recommendations in this section.

JVS Board of Directors

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Jewish Vocational Service

Helping people build, enhance, and change careers

June 4, 2004

Mr. Don Chadwick Principal Accountant-Auditor Department of Auditor-Controller **Audit Division** 1000 S. Fremont Ave.. Unit 51, Bldg. A9 East, Alhambra, CA 91803-4737

Dear Mr. Chadwick:

Enclosed please find our response to your draft audit report to the Board of Supervisors regarding the RITE Program implementation and compliance at JVS. This report addresses each issue brought to our attention including support documentation.

JVS has 75 years of experience in assisting Los Angeles area residents develop successful careers, and we look forward to continuing to service the immigrant and refugee community.

We appreciate your cooperation and evaluation.

Sincerely,

Vivian Seigel

Chief Executive Officer

WorkSource Center

5757 Wilshire Blvd. Promenade 3 🗷 Los Angeles, CA 90036 Phone 323 / 904-4900 **B** Fax 323 / 904-4905 **B** TTY 323 / 904-4906

City Office

6505 Wilshire Boulevard, Suite 200 a Los Angeles, CA 90048 Phone 323 / 761 8888 **a** Fax 323 / 761 8575 **a** TTY 323/ 761 5101

Valley Office

22622 Vanowen Street @ West Hills, CA 91307 @ Phone 818 / 464 3222 @ Fax 818 / 464 3375 Email: askus@ivsla.org www.ivsla.org









June 4, 2004

TO:

Don Chadwick, Principal Accountant-Auditor

FROM:

Vivian Seigel, CEO, JVS Claudia Finkel, COO, JVS

Tatyana Kodner, Director of Refugee and Immigrant Services, JVS

JVS RITE PROGRAM RESPONSE TO THE AUDITOR-CONTROLLER DRAFT AUDIT REPORT

Background

Jewish Vocational Service (JVS), a private, non-profit, non-sectarian, community-based social service organization, has been contracted by the Department of Community and Senior Services (DCSS) to provide culturally and linguistically appropriate job training and placement services to limited English proficiency (LEP) individuals, CalWORKS recipients, whose primary languages are Russian, Armenian, and Farsi and who have resided in the United States over five years.

The types of services provided by JVS include case management, job readiness training, academic guidance, career planning/career direction services, and job placement. JVS' offices are located in the Third and Second Districts.

The Contract between DCSS and JVS for the provision of services to RITE Program participants is a "Performance Based Contract".

Program Reguirements

JVS has been providing services to LEP individuals since 1998 strictly adhering to the program requirements delineated in the JVS contract with DCSS, as well as following the guidance and technical assistance provided.

Through the period from 1998, from the inception of the Program, to the present, monitoring reviews provided to JVS by DCSS reflected consistent approval, if not praise, of the services provided to participants, as well as the quality of documentation and participants' files reflecting activity and the work of JVS case managers.

DCSS continuously approved invoices submitted by JVS on a monthly basis as billing for performed activities.

Results of Review

Auditor-Controller auditing staff conducted review of the billing invoices, participants' files, as well as the personnel files of the RITE Program staff. The auditing group contacted some RITE Program participants, interviewed employers and every case manager on JVS staff involved in the RITE Program.

Auditor-Controller report states the following:

"The program participants and employers interviewed confirmed the accuracy of the 13 employment outcomes sampled. However, JVS did not always ensure that program participants were appropriately paid with paychecks meeting the State Labor Code requirements. In addition, JVS overstated 9 (56%) of the 16 job training outcomes (Case Management, Vocational Assessment, etc.) which resulted in JVS overbilling DCSS \$770 out of \$5,860 sampled. Examples of overbillings include the following:

- Billing for providing Vocational Assessments to participants that did not require it.
- Billing a Case Management fee when there was no face-to-face and/or telephone contact with the participant, as the contact requires.

JVS also billed for services provided to one individual that the GAIN Employment Activity and Reporting System (GEARS) reported as ineligible to receive program services. The services provided to this individual amounted to approximately \$1,400.

JVS's five Case Managers currently possess the work experience required by DCSS' contract. However, one of the five Case Managers did not possess the required work experience and/or educational requirements at the time she was hired by JVS approximately five years ago. As a

result, during the period of July 1999 – December 2000, DCSS paid JVS for services provided by this individual who did not have sufficient GAIN work experience".

The latter has been discussed in the meeting of JVS and Auditor-Controller's staff on March 17, 2004 and in subsequent discussions over the phone. In the course of the meeting and discussions JVS submitted written documentation based on the contractual obligations and proving the following:

- Vocational assessments questioned have been executed based on the contractual requirements for mandatory participants.
- Training provided by DCSS monitors dictated that case management notes needed to be brief and succinct. JVS case managers notes reflect required monthly, and more, interaction with participants stipulated by the contract and mandated for the tracking of participants' activity. (We would also like to mention that RITE Contract mandates the provision of language and culture sensitive services, and every case manager's first language is the first language of the participant).
- Billing for placements based on business paychecks without pay stubs, but supported by the employment verification forms signed by the employers, was executed following the contractual stipulation and provision, and technical assistance provided by DCSS monitors. (DPSS/GAIN Program policy differs from the RITE Program Contract requirements for employment verification, since DPSS/GAIN does fully acknowledge similar documentation (please see DPSS Administrative Memorandum #02-16, dated 5/14/02, Exhibit 1). Moreover, this documentation serves as proof for DPSS to decrease or stop cash assistance to Welfare recipients, as well as basis enough to deem those participants generating the income sufficient for the participants to be removed off Welfare rolls completely).
- One individual, a student, mentioned as ineligible for support services, namely, transportation, was, from the point of view of the case manager, entitled to the level of services provided by JVS.

JVS's five Case Managers working with the RITE Program participants have Bachelor's and Master's Degrees. Four out of five have had equivalency evaluation executed by the US Credentials Evaluation Services.

The issue with one case manager is political in nature - the case manager fled from prosecution as refugee from Iran, which did not allow the educational documents to be taken out of the country.

Knowing the educational institutions and the system of education in the country this case manager has been educated in (Iran), though without written verified proof, we can testify that she has an equivalent to a Bachelor's Degree. Moreover, this particular case manager has been with the RITE Program since its inception in 1998, and at that time the main stipulation of the Program was to hire capable welfare recipients.

Review of Report

On March 17, 2004, as was mentioned earlier, JVS discussed Auditor-Controller's report with the auditing staff in the presence of DCSS as a non-participating entity and presented documents and presented explanations to every questionable item.

We thank Auditor-Controller's staff for their cooperation and assistance during this review. We would especially like to thank Stephen Glazer who served as our contact in subsequent communications with the Auditor-Controller's office.

Please contact Tatyana Kodner, Director of Refugee and Immigrant Services, or Claudia Finkel, Chief Operating Officer at JVS, if you have any further questions.

Enclosures: Exhibit I; Attachments A, B, C, D, E.

CC: Supervisor Gloria Molina
Supervisor Yvonne Brathwaite Burke
Supervisor Zev Yaroslavsky
Supervisor Don Knabe, Chairman
Supervisor Michael D. Antonovich
David E. Janssen, Chief Administrative Officer
Department of Auditor-Controller, Audit Division:
Stephen Glazer
Department of Community and Senior Services:
Cynthia Banks, Chief Deputy Director
Josie Marquez, Program Director

JVS

REFUGEE AND IMMIGRANT TRAINING AND EMPLOYMENT PROGRAM (RITE) FISCAL YEAR 2003-2004

BILLED SERVICES

Objective

JVS' obligation, as a Contractor of DCSS for the implementation of the RITE Program, is "to comply with all terms and conditions set forth in the RITE Contract and those imposed by the Los Angeles County CalWORKS GAIN Program".

JVS is reimbursed for provision of services identified in the Contract Statement of Work for each performed activity and based on the relevant invoicing policies and procedures set forth in the Contract. The services contractually stipulated and provided by JVS through CalWORKS/RITE Program, as well as allowable to be billed for include the following:

- Case management
- Job Readiness and Career Planning (Full-time)
- (Flex) Job Readiness and Career Planning
- Vocational Assessment
- Career Assessment/Community Service Assessment
- Clinical Assessment
- Part-Time Employment (20hpw) prior to orientation
- Full-Time Employment (32-35hpw) prior to orientation
- Part-Time Employment (20hpw) after orientation
- Full-Time Employment (32-35hpw) after orientation
- Part-Time to Full-Time Upgrade
- Direct Placement or Upgrade into Part-Time or Full-Time Self-Sufficiency Employment

JVS' activity stipulated by the contractual requirements is reflected in the participants' files and Los Angeles County GEARS system, which had been introduced into the CalWORKS/RITE program in the 2000 (as opposed to the inception of the RITE Program itself that was instituted in October of 1998).

JVS continuously reflected participants' activity both in the hard copy files, as well as reported the outcomes of each participant's activity in the GEARS system, and based on the above, submitted billing invoices to DCSS monthly.

Results

(Per Auditor-Controller's Report)

Employment Outcomes

The 13 program participants and 11 of the employers that we were able to interview confirmed the accuracy of the 13 employment outcomes sampled. However, as noted later in the report, JVS did not always ensure that the program participants were appropriately paid with paychecks meeting the State Labor Code requirements.

Job Training Outcomes

JVS overstated 9 (56%) of the 16 job training outcomes (Case Management, Vocational Assessment, etc.) which resulted in JVS overbilling DCSS \$770 out of \$5,860 sampled.

- We selected a sample of six program participants that JVS billed the Department of Community and Senior Services (DCSS) for completing vocational assessments and noted:
- Three (50%) program participants did not require the assessments. The contract requires that unemployed program participants receive a vocational assessment within five work days of completing Job Club. Program participants that are exempt from program services do not require an assessment unless they request one. However, two program participants were employed and one program participant was exempted from the RITE program for medical reasons prior to receiving a ssessments and did not require them. JV S was paid \$140 for each participant.

JVS' Response To The Above Statement:

Three RITE Program participants mentioned, employed part-time, have been referred for Vocational Assessment based on the following:

a. Contract requirement "To provide Vocational Assessment for the purpose of determining the appropriate Welfare-to-Work

- activities for RITE participants, as well as screening to determine the need for support services" (Attachment A).
- b. CalWorks GAIN Welfare-to-Work Flow/Decision Chart stipulation on the use of Vocational Assessments for participants working part-time (Attachment B).
- c. GAIN/GEARS Program Training, conducted in December,2003 and January, 2004, indication in its training materials that "Parttime employed participants must be sent to VOC ASM" (Attachment C).

(Per Auditor-Controller's Report)

o Four (67%) program participants stated that their assigned JVS case manager never explained the results of the assessments. GEARS reported that the four participants have not been assigned to any designated activities based on the results of the assessments. In addition, two (33%) participants stated that JVS staff instructed them to sign several documents without explaining the documents to the participants.

JVS' Response to the above statement:

JVS strongly disagrees with the interpretation of clients' interviews. RITE Program participants are referred for Vocational Assessments to the JVS' Department of Disability and Assessment.

With its staff of Certified Vocational Evaluators, this Department has been providing Vocational Assessment Services for GAIN, GROW and RITE Programs for over five years. The Department specialists see 30-40 GAIN clients a week and are quite familiar with the GAIN program requirements re. Vocational Assessments, hence the inability of assessors to properly explain the results of the tests is doubtful at best.

Moreover, close collaboration of the RITE Program case managers and vocational evaluators creates an additional advantage for the RITE participants in their quest for career enhancement.

JVS case managers use the results of Vocational Assessments as a guideline for future participants' activity. Participants mentioned above were part-time employed when going through vocational assessments. Their respective evaluations demonstrated that these participants needed to continue current occupations along with ESL to improve their language capacity. GEARS system accepts

changes of the component, but is not capable of reflecting continuation. Case manager's notes in case files reflect the results of Vocational Assessments and the plan of action. GEARS, in this situation, will be updated at a later time, when participant moves to the next step in his/her career development.

(Per Auditor Controller's Report)

- We selected a sample of 10 program participants that JVS billed DCSS for case management services and noted:
- o Four (40%) program participants stated that they did not receive monthly telephone or face-to-face contact with their case managers during October and November 2003, as required by the contract. T wo other program participants also stated that their case managers contact them periodically, but that they can not remember the frequency. The six (60%) participant case files did not contain documentation to indicate that their Case Managers contacted them during this period.

JVS' Response to the above statement:

JVS presented copies of case management file notes reflecting mandated monthly contacts with participants (Attachment D).

(Per Auditor Controller's Report)

One (10%) program participant was not assigned to JVS until November 2003. However, JVS billed DCSS for case management services in October 2003.

JVS' Response to the above statement:

Participant mentioned above was referred to JVS in October, 2003.

GCAR, electronically generated list of participants served by each agency and reflecting the entire caseload of RITE Program participants, is being forwarded to JVS by DCSS monthly. Electronic file of each new participant is transmitted to the GEARS file cabinet of the RITE Program Supervisor.

It is at this point that the Program Supervisor establishes contact with each newly referred client and takes each client through the initial required steps (determining each client status from the point of view of program requirements, confirming the orientation date, scheduling of assessment).

According to DCSS' staff guidance, it is considered to be the first month when case management charges commence (Attachment E).

(Per Auditor-Controller's Report)
Participant Pay

California State Labor Code Section 226(a) requires that employers furnish each employee at the time of each payment an itemized statement in writing showing: (1) gross wages earned; (2) total hours worked for hourly wage earners; (3) all deductions; (4) net wages earned; (5) pay period; (6) the name of the employee and their social security number. In addition, the County contract requires JVS to review participants' paycheck stubs to confirm the hours worked prior to billing DCSS for job placements.

• Four (31%) of the 13 program participants with reported employment outcomes did not receive an itemized listing with their paychecks that reported the number of hours worked and/or any deductions for payroll taxes. JVS billed DCSS for the placements without reviewing a valid payroll check stub to confirm the participants' employment and hours worked. In addition, JVS staff did not inform the participants that they are required to receive from their employers a statement with each paycheck that lists the hours worked and payroll deductions.

JVS' Response to the above statement:

Verification of employment for the above mentioned participants was presented in the form of Company Checks along with Written Verification of Employment Signed by Employers, all of which is in direct compliance with the contractual stipulations (Attachment F).

(Per Auditor-Controller's Report) GEARS Activity

One program participant has not fulfilled their required weekly hours of program participation since March 2001. JVS should have referred the case to the Department of Public Social Services (DPSS) for non-compliance proceedings at that time. However, JVS did not refer the case and continued to bill DCSS \$42 per month for case management services and issued transportation expense reimbursements to the participant. The transportation expense overpayments to this individual totaled approximately \$1,400.

JVS' Response to the above statement:

The RITE Program participant in question, from the point of view of JVS case manager and DCSS monitors, was a full-time student

through the entire period of time, thus meeting the requirements of the RITE Program and being eligible for the provision of transportation as a support service.

Response Summary

JVS, as a non-profit, non-sectarian agency, with close to 75 years of experience, is continuously providing employment and career services to a diverse client population.

On an annual basis JVS assists over 14, 000 individuals in defining and achieving their employment goals through career and employment counseling, job skills instruction, job development, job placement, vocational assessment and training and assists many of them to become gainfully employed and achieve self-sufficiency.

JVS thanks the Auditor-Controller's staff for the recommendations and cooperation.

Authorized Signature

Vivian Seigel

Typed name

Chief Executive Officer